

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF IOWA

IN RE:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al*,

Debtor.

CHAPTER 11

CASE NO. 23-00623

PARTY'S NAME: Altera Digital Health, Inc.

PARTY'S ATTORNEY: Larry S. Eide, Schuyler Carroll (admitted pro hac vice), Noah Weingarten (to be admitted pro hac vice)

Check one: PLAINTIFF ☐ DEFENDANT ☐ OTHER ☒

EX NO. or LETTER	BRIEF DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	DISPOSITION AFTER TRIAL
A	Master Client Agreement with Digital Health Inc. ("Altera"), as successor to Allscripts Healthcare, LLC, dated March 9, 2021 (sealed by Order entered 12/20/23, Dkt. 588)						
B	Mercy and Altera's predecessor-in-interest Initial Client Order dated March 9, 2021 (sealed by Order entered 12/20/23, Dkt. 588)						
C	Mercy and Altera amendment to the Agreement and Client Order dated August 1, 2023 (sealed by Order entered 12/20/23, Dkt. 588)						
D	Mercy letter dated 12/8/23 to Altera						
E	Altera response dated 12/14/23 to Mercy letter						
F	Mercy letter dated 1/9/24 to Altera						

EX NO. or LETTER	BRIEF DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	DISPOSITION AFTER TRIAL
G	Declaration of Elliott Bryant in Support of Motion of Altera Digital Health Inc. to Compel Assumption or Rejection of Executory Contract and All Exhibits [Dkt. 589-6]						
H	Internal prep for Mercy Iowa City implementation 02112021 powerpoint						
I	Iowa City hospital to lay off 29 in wake of pandemic						
J	Mercy ELT Tracker 6.22.22 powerpoint						
K	Mercy ELT Tracker 7.6.22 powerpoint						
L	Mercy ELT Tracker 7.13.22 powerpoint						
M	Mercy Iowa City ELT Tiger Topics 5.23.22 powerpoint						
N	Mercy Iowa City ELT Tiger Topics 5.26.22 GP powerpoint						
O	Mercy Rev Task 8.1.22 powerpoint						
P	MIC Executive Final Summary 20191106						
Q	MIC Issue tracker						
R	MIC Timeline Final 20191106 powerpoint						
S	Opinion _ Mercy Hospital's inpatient closure will harm the most vulnerable Iowans - The Daily Iowan						
T	RE Mercy Iowa Revenue Cycle Agenda - Week of 8.8.22 w status updates msg						
U	Sales to Services Turnover - Mercy Iowa City Sunrise Implementation 02262021 powerpoint						
V	Stabilization ELT Update 7-21						

EX NO. or LETTER	BRIEF DESCRIPTION	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	DISPOSITION AFTER TRIAL
W	Stabilization ELT Update 7-21 SN						
X	u_patient_safety - 2024-01-05T135223.232						
Y							
Z							

The Exhibits described above are the Exhibits to be used by Altera in its case in chief.

Altera believes that some of the Exhibits described above contain confidential information that should not be shared with all parties. Altera is examining the Exhibits and will file the necessary motion to file under seal and to exclude from sharing with all parties.

This list does not include any exhibits or documents that may be necessary for impeachment purposes. Similarly this list does not include any deposition transcripts (except as noted), which will be used as exhibits, if necessary, for impeachment purposes and for refreshing any particular witness' testimony.

Altera also reserves the right to supplement, amend, withdraw, or otherwise modify this submission. Altera also designates any and all exhibits submitted or listed by any other parties in this matter or any exhibit needed to establish foundation for these exhibits, to impeach, or refresh the recollection of a witness.

### **WITNESSES**

Altera may call, if necessary, Elliott Bryant as a witness to provide testimony in Court. Altera may also designate any and all witnesses on a list submitted by any other parties in this matter. Altera also reserves the right to supplement, amend, withdraw, or otherwise modify this submission.